STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ACORN)		
(Association of Community Organizations)		
for Reform Now))		
•)	Docket No.	01-0317
Complaints regarding Service Termination)	•	
By People's Gas, Light and Coke Company)		

AFFIDAVIT

- 1. The undersigned, Madeline Talbott, is the Head Organizer for Illinois ACORN (Association of Community Organizations for Reform Now). Illinois ACORN is a chapter of the national ACORN organization, which is incorporated in Arkansas and registered to do business in the state of Illinois.
- 2. In the fall of 2000, I received notice from the state of Illinois that Illinois ACORN was late in filing something with the state to maintain its necessary standing to transact business in the state of Illinois. I immediately forwarded this notice by mail to Citizens Consulting Incorporated (hereinafter referred to as "CCI") in New Orleans, LA. CCI does all of Illinois ACORN's corporate legal work, including keeping Illinois ACORN up to date on its corporate filings. In addition to forwarding this notice to CCI by mail, I immediately followed up with a phone call notifying them of the problem. CCI informed me that they had fallen behind on some of our work, but that they would take care of any remaining problems.
- 3. On numerous occasions after this initial phone conversation, I was reassured by CCI that the matter had been resolved. I had a number of very clear conversations with CCI in the fall of 2000, where they assured me that the problem had been resolved.
- 4. As a result, at the time that Illinois ACORN filed and I signed complaints against Peoples Gas to the Illinois Commerce Commission (ICC) on April 4, 2001 and May 8, 2001, I was totally unaware that our good standing with the state of Illinois had lapsed. It was my understanding, because of CCI's reassurances, that Illinois ACORN was still in good standing to transact business within the state of Illinois. I did not know that CCI still had not resolved the issue with the state.
- 5. Upon receiving information on Monday, May 14, 2001, that Illinois ACORN was no longer in good standing with the state of Illinois, I immediately took action to resolve the issue. I called and emailed CCI and demanded that they take immediate action to rectify the problem. CCI quickly took the necessary actions, went to great lengths to immediately obtain the signature of the national ACORN President in Boston, MA and then sent the necessary materials by express mail to Springfield, IL.

- 6. In order to speed this process along, the staff at Illinois ACORN made arrangements, while on a lobby day in Springfield, to receive the express package from CCI and then hand deliver the materials to the Secretary of State's office in Springfield. CCI was told by officials at the Secretary of State's office that it could take three to four weeks to resolve the issue if we mailed the materials in, but that we could regain our good standing with the state of Illinois immediately by hand-delivering the items to the Secretary of State's office. Thus, we hand-delivered the materials that CCI had prepared on Wednesday, May 16, 2001, obtained our approval from the IL Secretary of State's office, and then filed our certificate of good standing with Cook County on Monday, May 21, 2001.
- 7. CCI informed me that they had lost track of our work because of a sick employee who had to leave the company. ACORN's status issue was apparently lost in the shuffle as a new person was brought on board.
- 8. Until May 14, 2001, I didn't know that our status had been revoked. When I signed the verification sheets attached to the ACORN complaints against People's Gas dated April 4, 2001 and May 8, 2001, I believed that we were still in good standing with the state of Illinois. Upon finding out that our status had been revoked, I took immediate action to rectify the situation. Illinois ACORN is now once again in good standing to transact business with the state of Illinois.

Madeline Talbott

SUBSCRIBED and SWORN to

before me this /211 day of

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cone ,2001.

Notary Public

My commission expires: 7 - 6 vool

"OFFICIAL SEAL"

BEVERLY MINNICH Notary Public, State of Illinois My Commission Expires July 26, 2001

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